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MEMORANDUM

To: Ted Leitzke
Site Project Manager for ARCS

cc: Jerry Canfield
Liz Bartz

From: Jeff Groen, Project Hydrogeologist

Date: December 10, 1993, 10:00 am to 2:30 pm

Subject: Wisconsin Steel Works Site, Project #04015.23
Notes on 12/8/93 Meeting with EPA, IEPA, and USACE

We completed a technical review of the "Site Characterization Interim Report (9/93)" prepared by the U.S. Army Corps of Engineers for the Wisconsin Steel Works Site (WSW) on November 5, 1993. Our technical comments were received by the Corps, and they subsequently requested an informal meeting with us. The meeting took place on December 8, 1993, at the federal EPA Region V headquarters in Chicago, IL. Representatives from the following agencies/companies were present at the meeting: USEPA - Region V (K. Tindall and L. Ripley), WWES (T. Leitzke and J. Groen), USACE - Buffalo Office (R. Leonard, F. Boglione, and B. Troyer), and the Illinois EPA (T. Fitzgerald, R. Watson, and E. Runkel).

The Corps indicated that an itemized response to the technical comments will be sent to the USEPA by January 1, 1994. Instead of revising the existing Interim Report, supplemental attachments will be sent along with the responses. In addition to preparing the above response, the Corps is currently preparing a Phase II Work Statement for contractor quotations, and they had two concerns which needed to be addressed at this meeting:

1) Which ARARs applied to the WSW site?
2) Which WSW environmental concerns should be addressed during the Phase II investigation?

ARARs

Mr. Watson of the IEPA Permitting Division provided much of the ARAR discussion. Among his key thoughts was the necessity to clearly describe the regulatory classifications as they applied to soil and groundwater characterization. No remediation is possible until the generated wastes are properly characterized Mr. Watson indicated that there were three broad categories of special wastes, that is those wastes that are not standard municipal or demolition wastes:

- Hazardous Wastes (characteristic or by definition);
- Pollution Control Wastes (incineration ash, sewage treatment sludges, etc.); and
- Industrial Process Wastes (baghouse dust, etc.).

Apparently, contaminated material which is not hazardous is generally considered a "pollution control special waste" in Illinois. The Corps indicated that no materials on the WSW site have been characteristically hazardous (via TCLP analysis), and that only toxic levels of PCBs (>50 ppm) have been observed. The Corps proceeded to focus on the various ARARs specific to such pollution control wastes, but Mr. Watson suggested that steel production facilities typically produce wastes which are hazardous by definition (K-listed hazardous wastes). This issue relates to the site's historical development, because, although many pits and foundations exist on the

site, most of the structures, themselves, have been demolished. The Corps recently assigned Mr. Bill Butler the task of pinpointing the location of WSW's previously-existing facilities/processes.

Mr. Watson indicated that there were three distinct ARAR categories: location-specific (100-yr. flood zones, etc.), action-specific (treatment of wastes, etc.), and chemical-specific (MCLS, etc.). He also provided the following federal and state ARAR references:

• Hazardous waste transportation/disposal, etc.	USEPA 40CFR.264	35IAC.724
• Non-hazardous special waste trans/disposal, etc.	---	35IAC.808 to 816
• Groundwater regulations (classification, etc.)	---	35IAC.620
• TSCA waste (incl. PCBs) trans/disposal, etc.	USEPA 40CFR.761	---

The issue of investigative-derived wastes (IDW) was raised; these wastes include drill cuttings and other waste materials generated during field investigations. The IEPA indicated that the holding/storage time for hazardous IDW is 90 days. If such wastes are not properly disposed of within the 90-day limit the facility must either apply for a RCRA Part B TSD permit or develop a RCRA Corrective Action closure plan, both of which are lengthy and expensive processes.

The issue of an operable unit was raised. Three possible operable unit designations may be used for the site: medium-related (air, soil, groundwater), area/process-related (coke plant area, steel production area, etc.), or a combination of the two. The Corps will pursue this issue in the future.

The issue of background data was raised. The technical comments indicated that US soil averages, Welsh soil averages, and the Velsicol cleanup standards were not appropriate for comparison with WSW data and background data was necessary. Mr. Fitzgerald, the IEPA Project Manager, indicated that a minimum of ten samples per medium was necessary to develop a statistically significant database of background levels. Although difficult, this may mean that residential and/or public properties will be accessed to collect background samples.

The issue of the Carmi Sand's aquifer classification was also raised. The Corps was told that the Carmi Sand aquifer was considered a Class I Potable Groundwater Resource, unless proven otherwise; the burden-of-proof rested on the Corps.

Environmental Concerns for Phase II Investigation
In general, the Corps agreed with the following technical comments:

- The Wadsworth Till should be characterized as an aquitard, rather than an aquifer.

- Phase II investigations should include development of the site-specific stratigraphy beneath the Wadsworth Till as well as sampling and analysis of these deeper geologic units for contamination. (In fact, the Corps brought a site map with a proposal for 8 deep soil boring/well locations to investigate deeper geologic units.)

- Characterization/Investigation of LNAPLs should be conducted via the installation of water table monitoring wells. (In fact, the Corps brought a site map with a proposal for two water table wells.)

The Corps also indicated that they would investigate the following concerns:
- DNAPLs (especially in the vicinity of the former Coke Plant, Area II).
- Effect of the storm sewer network on the Carmi Sand water table and drainage to the Calumet River.
- Historical development of sewage treatment sludges and ash residue from the steel production furnaces.

WWES agreed to respond to the proposed monitoring well locations by mid-January, 1994.